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## **Civil Action No. 84-3040 Notice of Depositions and Request for Documents**

United States District Court for the District of Columbia

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ANN B. HOPKINS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 84-3040
	)	(Gesell, J.)
PRICE WATERHOUSE	)	
	)	
Defendant.	)	

NOTICE OF DEPOSITIONS  
AND REQUEST FOR DOCUMENTS

To: Price Waterhouse  
c/o Wayne A. Schrader  
Attorney for Defendant

1. This is notice that plaintiff will take the oral depositions of the following persons at the headquarters offices of defendant in New York City, 1251 Avenue of the Americas, at the indicated times on Friday, January 12, 1990:

Joseph E. Connor 10:00 a.m.

M. Neil Redford 2:30 p.m.

2. Defendant is asked to bring to these depositions all documents or written or graphic material which relate to the following subjects or fit the following descriptions. (The word "partner" in all its variants includes "principal" in all its variants)

(a) The nomination for and/or election to partnership in Price Waterhouse during the last 15 years of any person who was


previously nominated for, but not elected to, partnership in another major \* accounting or management consulting firm.

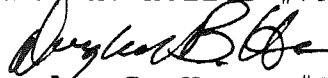
(b) The nomination for and/or election to partnership in another major \* accounting or management consulting firm of any person who was previously nominated for, but not elected to, partnership in Price Waterhouse.

(c) Price Waterhouse's policy and practice during the period since 1983 concerning the geographic reassignment or relocation of partners between offices of the firm located in different metropolitan areas, including any policy or practice of requiring such reassignments or relocations against the wishes of the partner(s) in question.

(d) Instances during the last 15 years in which a partner of Price Waterhouse has been subjected to mandatory withdrawal from the firm or has been forced to accept early retirement for reasons other than physical or mental disability.

(e) Any other documents which defendant intends to offer as exhibits at the trial of remedy/relief issues in connection with the testimony of Mr. Connor or Mr. Redford.

  
James H. Heller #79350

  
Douglas B. Huron #89326  
KATOR, SCOTT & HELLER  
1275 K Street, N.W. #950  
Washington, D.C. 20005-4006

Attorneys for Plaintiff

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\* "Major" means, for these purposes, 50 or more partners at the time in question.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on defendant by delivering a copy to the office of Wayne A. Schrader, Attorney for Defendant, 9th floor, 1050 Connecticut Avenue, N.W., Washington, D.C. on January 3, 1990.

  
\_\_\_\_\_  
James H. Heller